

# EXHIBIT A


**AFFIDAVIT**

I, Suzanne Hayden, having first been duly sworn, on oath depose and state as follows:

1. I am a teacher at Parker Junior High School in District 161.
2. In 2016, Chad Readey was in one of my classes.
3. During 2016, there were a group of boys that would slap female students on their buttocks. Chad Readey was part of that group and I observed him hit a female student on her buttocks in class. As a result, I followed District 161 procedure by reporting Chad Readey to administration.
4. A true and accurate copy of the disciplinary report is attached hereto as Exhibit 1. It characterized the incident as a “major” referral and the behavior was characterized as “harass”.
5. My follow up email communication with Chad Readey’s parents is attached as Exhibit 2. I spoke with Chad Readey’s parents about Chad’s behavior of touching the female student on her buttocks.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true. 735 ILCS 5/1-109.

FURTHER AFFIANT SAYETH NOT.



Suzanne Hayden

11/15/22  
Date



**Parker Junior  
High School**  
Generated: Nov 10,  
2022, 2:32:45 PM

Student Dashboard  
CONFIDENTIAL  
Chad Readey

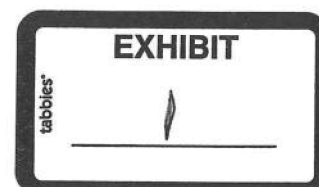
Referrals Per Year			
School Year	Major	Minor	Total
2022-23	0	0	0
2021-22	0	0	0
2020-21	0	0	0
2019-20	0	0	0
2018-19	0	0	0
2017-18	0	0	0
2016-17	0	0	0
2015-16	1	0	1

Summary	
District ID:	
SWIS ID:	9996326
Gender:	Male
Grade:	--
Ethnicity:	Black/African American
Has 504 Plan:	No
On IEP:	No
Disabilities:	--
Major Referrals:	1
Major Referrals This Year:	0
Minor Referrals:	0
Minor Referrals This Year:	0
Last Referral:	2/4/16
CICO:	No

Student Referrals								
Date / Time	Referral Type	Staff	Location	Behavior	Motivation	Others Involved	Action Taken	Seclusion / Restraint
2/4/16, 12:15 PM	Major	Suzanne Hayden	Class	Harass	Unknown	Unknown	Sat sch	No
Notes: Student was observed hitting a female student on her butt.								

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SWIS Suite  
www.pbisapps.org



From: Lisa McGill lisadmccgill@yahoo.com  
Subject: Re: Setting Up an In-Person Conversation - re: Chad Readey  
Date: July 7, 2016 at 6:28 AM  
To: Suzanne Hayden shayden@sd161.org  
Cc: Jay Readey jay\_readey@yahoo.com



Please provide a few options. I need to sync up both of our calendars.  
I'm out of town Thursday on business travel. Also, are you thinking dean, principal, or both?

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We're not going to get rid of chaos and complexity...but we can find a way to live with them.  
-- Al Held, abstract painter

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From: Suzanne Hayden <shayden@sd161.org>  
To: Lisa McGill <lisadmccgill@yahoo.com>  
Cc: Jay Readey <jay\_readey@yahoo.com>  
Sent: Monday, February 8, 2016 1:18 PM  
Subject: Re: Setting Up an In-Person Conversation - re: Chad Readey

Good afternoon!  
Yes definitely, I think a meeting with administration would be appropriate at this time. Our availability is Thursday at 7:55 am.  
Please let me know if this will work.  
Thanks!  
Mrs. Hayden

Sent from my iPad

On Feb 8, 2016, at 10:11 AM, Lisa McGill  
<[lisadmccgill@yahoo.com](mailto:lisadmccgill@yahoo.com)<<mailto:lisadmccgill@yahoo.com>>> wrote:

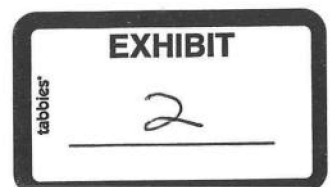
Ms. Hayden,

I'm hoping that you can find some time for us to set up an in-person conversation. In addition, we can think about having the dean or principal sit in as well, if appropriate.

If we had received one or two calls regarding Chad's behavior, I would not ask for this meeting. However, given that we have received one email and three calls with a short time period, it's probably good to sit down.

As a parent, I want to be more intentional about figuring out the following:

- Is it just Chad or a larger student/class management issue?
- What's the vibe and culture of your classroom so we can better assist Chad in fitting within that environment?



asking them that question.

- Does the school track steps by teacher? I'm a data and youth policy wonk, and I'm curious about how your numbers fit within the bigger picture.

The last issue is a bit of a sidebar, but I definitely want to flag it: I had a long discussion with Chad about alliteration, because we went over the FDR homework. You had mentioned during one of our calls that he was missing concepts. My conversation with Chad was part of a larger conversation about having a voice in class when he has questions or disagrees with a point of view, etc. I'll just be blunt: I don't feel that what you are teaching as alliteration is, in fact, alliteration. At least that's the case for the FDR speech. I could sit back and say nothing. But the English major/Ph.D. (with a focus in American literature) in me makes it really hard. It doesn't help Chad that he's surrounded by creative writing and English literature Ph.D.s on his dad's side, too, so we talk about this stuff all of the time. I'd love to discuss.

Please know that we are working with Chad on the flirting with girls issue, and I take it seriously. I had a similar issue when I was his age. A boy hit my bottom, and I hit him back with the jump rope in gym. Ironically, I was the one who got in trouble. I'm glad that times have changed, although it's pretty normative behavior at this age.

As you can imagine, after school or before school works best. We are working parents. It's actually a struggle for me to receive phone calls during the day from the school. If I see the number, I'm assuming it's a crisis.

Thanks for considering,

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We're not going to get rid of chaos and complexity...but we can find a way to live with them.

abstract painter

-- Al Held,